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21 Attorneys for Plaintiff, KENT WARD

22 IN THE UNITED STATES DISTRICT COURT

23 NORTHERN DISTRICT OF CALIFORNIA

24 SAN FRANCISCO DIVISION

25 KENT WARD,) Case No. CV 09-04565 RS
26 Plaintiff,)
27 v.)
28 EQUIILON ENTERPRISES, LLC, SHELL OIL)
PRODUCTS COMPANY LLC AND DOES 1)
TO 50, inclusive,)
Defendants.)
)

) **JOINT STIPULATION AND [PROPOSED
ORDER] TO EXTEND THE DEADLINE
FOR DEFENDANTS' FILING OF A
REPLY BRIEF IN SUPPORT OF ITS
MOTION TO LIMIT DISCOVERY OF
EQUILON'S ROOT CAUSE ANALYSIS
INVESTIGATION AND REPORT**
)
Date: February 23, 2011
Time: 9:30 a.m.
Dept.: F, 15th Floor
Judge: Hon. Magistrate Judge Larson

29 [Civ. L.R. 6-2 and 7-3(c)]

30 Trial Date: None

31 Pursuant to Civil Local Rule 6-2 and 7-3(c) of the United States District Court for the
32 Northern District of California, it is hereby stipulated by and between Plaintiff Kent Ward and

1 Defendants Equilon Enterprises, LLC and Shell Oil Products Company LLC (collectively
2 "Equilon"), by and through their respective counsel of record, as follows:

3 1) Equilon shall have an extra two days beyond the deadline set forth by L.R. Rule 7-3(c)
4 to file and serve its Reply Brief in support of its Motion to Limit Scope of Depositions to Prohibit
5 Plaintiff's Discovery of Equilon's Root Cause Analysis and Investigation and Report (the
6 "Motion") and any supporting declarations. As such, Defendants' Reply Brief and Supporting
7 Declarations shall be e-filed with this Court and served no later than **Friday, February 11, 2011**,
8 instead of Wednesday, February 9th. The hearing on Equilon's Motion remains scheduled for
9 hearing on February 23, 2011.

10 The reason for this Stipulation is Equilon's counsel's current case-load and work schedule
11 requires it be granted this brief extension to adequately consider and respond to Plaintiff's
12 opposition to its Motion. The brief two day extension will cause no prejudice to any of the parties
13 or affect in any way the scheduled February 23, 2011 hearing date on the Motion.

14 The parties have previously stipulated to two extensions of the discovery cut-off date in
15 this case granted by Judge Seeborg. . .

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2 IT IS SO STIPULATED.
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Date: February 2, 2011

DAVIS WRIGHT TREMAINE LLP

By: /s/ Sam N. Dawood
SAM N. DAWOOD

Attorneys for Defendants EQUILON ENTERPRISES LLC,
and SHELL OIL PRODUCTS COMPANY LLC

10 IT IS SO STIPULATED

11 Date: February 2, 2011

12 JONES, CLIFFORD, JOHNSON, DEHNER, WONG,
MORRISON, SHEPPARD & BELL, LLP

13 By: /s/ Steger P. Johnson
14 STEGER P. JOHNSON

15 Attorneys for Plaintiff KENT WARD

DAVIS WRIGHT TREMAINE LLP

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ORDER

Pursuant to the above stipulation by the parties, the foregoing is approved and **IT IS SO ORDERED.**

DATED: February 4, 2011.

THE HONORABLE U.S. MAGISTRATE JUDGE
JAMES LARSON

DAVIS WRIGHT TREMAINE LLP